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Attorney for Defendant, Nicholas Martino

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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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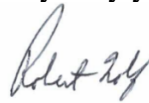
IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	)	CRIM. NO. 17-00240-001
	)	
vs.	)	
	)	
NICHOLAS MARTINO	)	DEFENDANTS VIOLATION OF
	)	PROBATION SENTENCING
	)	MEMORANDUM
	)	

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Please be advised that Defense Counsel has received the Government's sentencing Motion which asks the Court to take into consideration as "relevant conduct", the allegations contained in several counts of the Violation of Probation that were not admitted to by the Defendant. The Defendant denies those allegations. Defense Counsel objects to admission of any of those facts, as the VOP Plea Agreement (#40 on the Docket) includes an agreement by the Government to withdraw the other counts of the Violation in exchange for the Defendant's plea of Guilty to Counts 3 and 12.

Very truly yours,



Robert C. Wolf, Esq.

Dated: 11/25/19

Cc: AUSA Sara Aliabadi  
Nicholas Martino